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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHENG THAO,

Defendant.

Case No. 25-CR-0003-YGR (KAW)

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

and

[PROPOSED] ORDER

Defendant Sheng Thao and the United States, by and through their counsel of record, hereby stipulate as follows

1. Sheng Thao made her initial appearance before the Court on January 17, 2025. The Court entered an order setting a personal-recognizance appearance bond in the amount of \$50,000 and set conditions of release (including, in relevant part, a no-travel location restriction outside of the Northern and Eastern Districts of California). *See* DE-14.

2. The parties agree on the following conditions-of-release modification: Ms. Thao will be permitted to travel to the Southern District of California during the period of September 20-22, to attend the Hmong 50th Anniversary Celebration event. Ms. Thao was recently contacted by an organizer of this event and asked to attend.

3. Pretrial Services Officer Reanna Agah has no objection to the stipulated location/travel modification of Ms. Thao's conditions of release.

IT IS SO STIPULATED.

Dated: September 17, 2025

DLA PIPER LLP (US)

By: /s/Jeffrey E. Tsai

JEFFREY E. TSAI

DARRYL L. TARVER

Attorneys for Defendant

SHENG THAO

Dated: September 17, 2025

UNITED STATES OF AMERICA

By: /s/Abraham Fine

ABRAHAM FINE

MOLLY K. PRIEDEMAN

LLOYD FARNHAM

Assistant United States Attorneys

[PROPOSED] ORDER

Pursuant to the stipulation of the parties, Defendant Sheng Thao's conditions of release are modified as follows:

Ms. Thao is permitted to travel to/from the Southern District of California during the period of September 20-22, 2025, in order for Ms. Thao to attend the Hmong 50th Anniversary Celebration event.

IT IS SO ORDERED.

Dated:

THE HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE